

REMARKS

Drawings

Figure 1 has been amended to include the legend "Prior Art".

Claim rejections

The present application has been amended in order to place the application in condition for allowance. Applicant, by the amendments presented above, has made a concerted effort to present claims which clearly define over the prior art of record, and thus to place this case in condition for allowance.

In the Office Action, the Examiner rejected the claims under 35 U.S.C. § 101 as being non-useful. Independent claim 1 has been amended to specifically claim post-solution activity which renders claims 1-14 subject to patent protection.


In the Office Action, the Examiner rejected the claims 35 U.S.C. § 102 as being anticipated by the publication entitled "Estimating Routing Congestion Using Probabilistic Analysis", (Lou et al., Proceedings of the 2001 International Symposium on Physical Design, pages 112-117, April 1-4, 2001). Attached is a Declaration of Inventor which establishes invention of the subject matter of rejected claims 1-14 prior to the effective date of the reference, April 1-4, 2001. Therefore it is respectfully requested that the Examiner's rejections under 35 U.S.C. § 102 be withdrawn.

Should the present claims not be deemed adequate to effectively define the patentable subject matter, the Examiner is respectfully urged to call the undersigned attorney of record to discuss the claims in an effort to reach an agreement toward allowance of the present application.

Respectfully submitted,

Date: January 18, 2005

By: _____


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Amendments to the Drawings:

Please amend the drawings as follows:

In Figure 1, please add the legend -- Prior Art --.

In accordance with the Rules, a replacement drawing sheet identified in the top margin as "Replacement Sheet" is enclosed.